

1 DANIEL J. ALBREGTS, ESQ.
Nevada Bar #004435
2 DANIEL J. ALBREGTS, LTD.
601 South Tenth Street, Suite 202
3 Las Vegas, Nevada 89101
Telephone: (702) 474-4004
4 Facsimile: (702) 474-0739
Email: albregts@hotmail.com
5 Attorney for Defendant ABDIEL ARMENTA VEGA

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,) CASE NO. 2:15-cr-0320-KJD(PAL)
11)
12 Plaintiff,)
13 vs.)
14 ABDIEL ARMENTA VEGA,)
15 Defendant.)

16 **DEFENDANT'S UNOPPOSED MOTION FOR APPROVAL TO TRAVEL**

17 The Defendant, ABDIEL ARMENTA VEGA, hereby petitions this Court for an
18 Order allowing him to travel from his home in Chicago, Illinois to Houston, Texas for
19 employment purposes. This request is based upon the attached Memorandum, together
20 with all the papers and pleadings on file, and any argument if the Court determines an
21 argument is necessary for the determination of this request.

22 DATED this 28th day of September, 2017.

23 DANIEL J. ALBREGTS, LTD.

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25 By: /s/ Daniel J. Albregts
Daniel J. Albregts, Esq.
Nevada Bar No. 004435
26 Attorney for Defendant VEGA
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1 **MEMORANDUM**

2 On November 2, 2015 the defendant appeared for his initial appearance shortly
3 after his arrest on the charges contained in the Indictment. At that time, the Government
4 did not seek Vega's detention and he was thereafter released on a personal recognizance
5 bond with various conditions, including pretrial supervision. Counsel has spoken with
6 Vega's current supervising officer, Judith Lesch from the Northern District of Illinois, who
7 confirms that Vega has been compliant with all the terms and conditions of his release
8 since he was placed on supervision. She further confirmed that Vega is on e-reporting,
9 and reports every month. Vega has also been removed from GPS monitoring given his
10 compliance with his conditions of release. Finally, she authorized counsel to inform the
11 Court she has no objection to Vega traveling to Houston, Texas for the purposes of
12 employment.

13 Specifically, Vega has secured employment with a Chicago company that
14 specializes in disaster clean up. As a condition of Vega's employment, he needs to travel
15 to Houston, Texas for the purposes of assisting the clean up of the damage caused by the
16 recent hurricane. It is uncertain how long this employment will last in Houston, and much
17 of it depends upon the nature of the clean up and how quickly it takes the company to
18 complete the parameters of their contract for that work. Vega's pretrial officer has
19 indicated that it is acceptable to her if this Court orders that Vega notify her upon his
20 departure to Houston for employment, continue monthly reporting while in Texas as he
21 reports now (electronic reporting), and notifying the pretrial officer immediately upon his
22 return from Texas. Essentially, the Court would simply be amending the travel restriction
23 to allow Vega to travel to Texas for this employment.

24 Counsel has spoken with the prosecutor assigned to this matter who has indicated
25 he has no objection to this request. Given that this travel request is unopposed by the
26 Government or Vega's Pretrial Officer, the defense would respectfully request that this

27 . . .

1 Court grant this request and allow Vega to travel to Houston, Texas for employment
2 purposes.

3 DATED this 28th day of September, 2017.

4 DANIEL J. ALBREGTS, LTD.

5 By: /s/ Daniel J. Albregts
6 Daniel J. Albregts, Esq.
7 Nevada Bar No. 004435
8 Attorney for Defendant VEGA
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3 UNITED STATES DISTRICT COURT
4 DISTRICT OF NEVADA

5 UNITED STATES OF AMERICA,)

CASE NO. 2:15-cr-0320-KJD(PAL)

6 Plaintiff,)

7 vs.)

8)
9 ABDIEL ARMENTA VEGA,)

10 Defendant.)
11


ORDER ALLOWING TRAVEL

12 Based upon the foregoing Defendant's Unopposed Motion for Approval to Travel,
13 and good cause appearing therefore,

14 IT IS HEREBY ORDERED that Defendant Vega's conditions of release are
15 amended to allow him to travel to Houston, Texas for the purposes of employment.

16 IT IS FURTHER ORDERED that Vega continue monthly reporting as directed by
17 the pretrial officer, and notify the pretrial officer at the time of his departure to Houston and
18 upon his return to Chicago at the completion of his employment obligation.

19 DATED this 29th day of September, 2017.

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21 United States Magistrate Judge
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